

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITE HERE HEALTH, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 14 C 251
	)	
LE PERIGORD, INC., d/b/a LE PERIGORD	)	JUDGE MATTHEW F. KENNELLY
RESTAURANT,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, LE PERIGORD, INC., d/b/a LE PERIGORD RESTAURANT, in the total amount of \$102,839.67, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,070.00.

On February 5, 2014, the Summons and Complaint was served on the Defendant (by tendering a copy of said documents to Christopher Briguet) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on February 26, 2014. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Laura M. Finnegan

Laura M. Finnegan  
Attorney for Plaintiffs  
BAUM SIGMAN AUERBACH & NEUMAN, LTD.  
200 West Adams Street, Suite 2200  
Chicago, IL 60606-5231

**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 1st day of April 2014:

Mr. Georges Briguet, CEO  
Le Perigord, Inc., d/b/a Le Perigord Restaurant  
405 E. 52nd Street  
New York, NY 10022-6387

/s/ Laura M. Finnegan

Laura M. Finnegan  
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